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June 8, 2022

VIA ECF

Hon. Denise Cote
United States District Court for the Southern
District of New York
United States Courthouse
500 Pearl Street, Room 1910
New York, NY 10007

**Re: Witherspoon v. Sia Partners U.S., et al.
Civil Action No. 21-cv-05555-DLC**

**Green v. Sia Partners U.S., et al.
Civil Action No. 21-cv-05626-DLC**

**(Witherspoon Status Update & Request for Adjournment
of Discovery Deadlines in Green)**

Dear Judge Cote:

This firm represents Plaintiffs Brittney Witherspoon and Jennifer Green in the above-referenced related actions. We write with the consent of Defendants' counsel to advise the Court about the parties' progress in resolving the Witherspoon matter and to request an extension of certain discovery deadlines in the Green matter.

The parties have reached a settlement in Ms. Witherspoon's case. Upon execution of that agreement and performance of certain obligations therein, the case will be withdrawn with prejudice. Resolution of the Witherspoon case was accomplished directly between counsel which took time and resources from the parties' discovery efforts in these related actions that largely involve the same discovery disputes and deponent list. The parties, therefore, respectfully request additional time to continue with discovery focused only on Ms. Green's claims, if necessary given that counsel and the parties have also been actively working together to achieve the full and final settlement of that matter, as well.

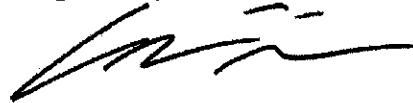
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The current Scheduling Order requires that all fact discovery, including depositions, be completed by July 1, 2022. We request that the deadline to complete fact discovery be extended to August 1, 2022. The parties were directed to conduct a mediation session before the end of June 2022. However, the parties were unable to have the same court appointed mediator, Marc Isserles, preside over a second session and were unable to agree to proceed before the newly appointed mediator who did not appear to have experience in employment law, which the parties believe is of critical importance here. Accordingly, it is our understanding that we may respectfully request that the mediation office appoint a new mediator with that expertise – again, if and only if the parties' direct negotiations at this time do not result in the full and final settlement of that matter within the next two-week period.

Defendants consent to this request. This is the second request to extend a discovery deadline. A revised proposed scheduling order is filed with this request.

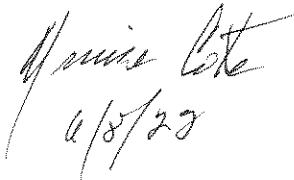
Respectfully submitted,



G. Micah Wissinger

cc: All counsel of record

The Trial Order remains due 9/16/22. Plaintiff's expert reports, if any, remain due 7/1/22. The parties may adjust interim dates on consent, including the mediation schedule.



Denise Cote
6/8/22